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May 16, 2025

The Honorable Rachel P. Kovner
United States District Judge
Eastern District of New York
255 Cadman Plaza East
Brooklyn, New York 11201

United States v. Shares of 21 East 61st Street Apartment Corp. et al.
Civil Docket No. 24-2147

Dear Judge Kovner:

Our firm represents Lovitas, Inc. and Baloas, Inc., the corporate entities that own the properties at issue in this civil forfeiture action, and Dr. Hak Seon Kim (“Dr. Kim”), the ultimate beneficial owner of the properties (collectively, the “Claimants”).

On June 14, 2024, the government served an initial set of Special Interrogatories on Claimants. On September 3, 2024, the government served a second set of Special Interrogatories on Dr. Kim. Claimants responded to the first set of interrogatories and served a series of supplemental responses throughout the summer and fall of 2024. Dr. Kim responded and/or objected to the second set of special interrogatories. The parties’ respective positions regarding the course of discovery are detailed in ECF No. 21.

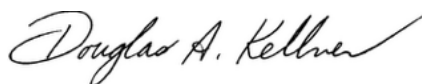
On November 6, 2024, the Court adjourned the deadline to file a responsive pleading on the basis that a contemplated motion to strike from the government was forthcoming. On January 7, 2025, the Court ordered that the government shall file its pre-motion conference letter on any anticipated motion to strike by February 28, 2025. At the request of the parties, and in light of ongoing discussions regarding a resolution of this matter, the Court extended the government’s deadline to file a pre-motion conference letter on its anticipated motion to strike twice, to May 16, 2025.

On Tuesday, May 13, 2025, the government communicated that it does not at this time intend to file a motion to strike. The government instead indicated that it intends

to file a motion to compel further responses to its previously served Second Set of Special Interrogatories, in accordance with Judge Marutollo's individual rules governing discovery motions.

As detailed in ECF No. 21, the parties last met and conferred regarding discovery on October 29, 2024. The parties intend to meet and confer regarding the government's anticipated motion to potentially narrow or obviate the need for motion practice on this issue altogether. To ensure the parties have sufficient time to meet and confer, and to accommodate unavoidable international travel I have scheduled, the parties jointly request leave to file a further status report on this issue by May 30, 2025.

Respectfully,

A handwritten signature in black ink, reading "Douglas A. Kellner". The signature is written in a cursive, flowing style with a long, sweeping underline.

Douglas A. Kellner
Attorneys for Claimants